

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ELIZABETH REEDER,

Plaintiff,

v.

NAVY FEDERAL CREDIT UNION, *et al.*

Defendants.

Civil Action No.: 1:24-cv-01904

NOTICE OF REMOVAL

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Pursuant 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Navy Federal Credit Union (“Navy Federal”) hereby removes this action from the Circuit Court of Fairfax County to the United States District Court for the Eastern District of Virginia, and states as follows for its Notice of Removal. Removal is proper because this Court has subject matter jurisdiction over this action under federal question jurisdiction pursuant to 28 U.S.C. § 1331. Accordingly, Navy Federal removes this action to this Court and states as follows.

I. INTRODUCTION

1. On October 3, 2024, Plaintiff Elizabeth Reeder (“Plaintiff”) filed a Complaint against Navy Federal and Equifax Information Services, LLC (“Equifax”) in the Circuit Court of Fairfax County (“State Court”), styled *Elizabeth Reeder v. Navy Federal Credit Union, and Equifax Information Services, LLC*, Case No. CL-2024-14108, seeking \$24,000.00 in actual damages, as well as punitive damages and attorneys’ fees, under the Fair Credit Reporting Act

(“FCRA”), 15 U.S.C. § 1681, *et seq.*, (“State Court Action”). A copy of the Complaint is attached hereto as Exhibit A.

2. Navy Federal’s removal of this case is timely as Plaintiff served Navy Federal on October 8, 2024. *See* 28 U.S.C. § 1446(b). Navy Federal has filed this notice of removal within 30 days of receipt of the Complaint, and thus, this Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b).

3. No other defendant in this case has been served.

II. GROUNDS FOR REMOVAL

4. This case is removable pursuant to 28 U.S.C. §§ 1331.

5. The Court has jurisdiction over the FCRA causes of action pursuant to 28 U.S.C. § 1331 as this federal claim arises under this Court’s original jurisdiction and is founded on a claim or right arising under the Constitution, treaties, or laws of the United States and is removable without regard to citizenship or residence of the parties.

6. Accordingly, as the Court has federal question jurisdiction over the FCRA claims pursuant to 28 U.S.C. § 1331, removal is proper.

III. VENUE

7. Venue is proper in this Court because this District encompasses the State Court, which is the forum from which the case has been removed. *See* 28 U.S.C. § 1441.

IV. NOTICE

8. Pursuant to 28 U.S.C. § 1446(d), and concurrent with filing this Notice of Removal, Defendant will file a Notice of Filing Notice of Removal with the Clerk of the State Court and will attach a copy of this Notice of Removal thereto. A copy of the Notice of Filing Notice of Removal (without its exhibits) is attached hereto as Exhibit B.

9. Upon information and belief, the contents of Exhibits A-B constitute copies of all process and pleadings served upon the defendant in the State Court Action pursuant to 28 U.S.C. § 1446(a).

10. Defendant reserves the right to amend this Notice of Removal.

11. By removing the case to this Court, Defendant does not waive any defenses, objections, or motions available to them under the applicable law.

WHEREFORE, having met all the requirements for removal under 28 U.S.C. §§ 1441 and 1446, including all the jurisdictional requirements of 28 U.S.C. § 1331, Defendant Navy Federal Credit Union hereby removes this action from the Circuit Court for Fairfax County to the United States District Court for the Eastern District of Virginia and seeks whatever further relief this Court deems equitable and just.

Date: October 29, 2024

Respectfully submitted,

/s/ Elizabeth M. Briones
Dave Gettings, VSB No. 80394
Elizabeth M. Briones, VSB No. 92130
Troutman Pepper Hamilton Sanders LLP
401 9th Street NW, Suite 1000
Washington, DC 20004
P: 202-274-2937
dave.gettings@troutman.com
elizabeth.briones@troutman.com
Counsel for Defendant Navy Federal Credit Union

CERTIFICATE OF SERVICE

I certify that on the 29th of October, 2024, a true and correct copy of the foregoing was sent via ECF and Federal Express to the following:

J. Andrew Shuniak, Esq.
Law Offices of Robert S. Gitmeid & Assoc., PLLC
814 Admiral Gravely Boulevard
Richmond, Virginia 23231
Tel: (571) 201-9021
Attorney for Plaintiff

/s/ Elizabeth M. Briones
Dave Gettings, VSB No. 80394
Elizabeth M. Briones, VSB No. 92130
Troutman Pepper Hamilton Sanders LLP
401 9th Street NW, Suite 1000
Washington, DC 20004
P: 202-274-2937
dave.gettings@troutman.com
elizabeth.briones@troutman.com
Counsel for Defendant Navy Federal Credit Union